

BellSouth Telecommunications, Inc.

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September 11, 2003

Guy M. Hicks — C — W — D General Counsel

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T.R.A. DOCKET ROOM

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re: Sprint-United Tariff 2003-710 to Introduce Safe and Sound II Solution

Docket No. 03-00442

Dear Chairman Tate:

Enclosed are the original and fourteen copies of BellSouth's Petition for Leave to Intervene. Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee

IN RE:

Sprint-United Tariff 2003-710 to Introduce Safe and Sound II Solution

Docket No. 03-00442

PETITION OF BELLSOUTH TELECOMMUNICATIONS, INC. FOR LEAVE TO INTERVENE

BellSouth Telecommunications, Inc., pursuant to T.C.A. §4-5-310 and T.C.A. §65-2-107, petitions the Tennessee Regulatory Authority (the "Authority") for leave to intervene in the above-captioned proceeding, and in support thereof states as follows:

- 1. Petitioner, a Georgia Corporation authorized to conduct and conducting a public utility business in the state of Tennessee, is engaged in furnishing exchange telephone service and intrastate (long distance) intraLATA telephone service in the state of Tennessee subject to the jurisdiction of the Authority and pursuant to T.C.A. §65-4-101 and T.C.A. §65-5-201, et seq.
- 2. Sprint's Safe and Sound II Solution tariff offers a package of services to Tennessee consumers at discounted rates. Sprint's tariff offering is similar to offers made by competitors in the telecommunications industry and other competitive industries as well. BellSouth has a continuing interest in providing discounted offers and packages to its customers in Tennessee in response to its competitors, and therefore has an interest in this proceeding.

- 3. Petitioner's legal interests may be determined in the proceedings and Petitioner's interests will not be adequately represented unless the Authority allows the petitioner to intervene.
- 4. Allowing Petitioner to intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.
- 5. Petitioner respectfully requests that it be granted leave to intervene and participate as a party in the above-captioned proceeding.

WHEREFORE, Petitioner prays:

- 1. That it be permitted to intervene in this proceeding and participate as a party.
- 2. That Petitioner have such other and further relief to which it may be entitled.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

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CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2003, a copy of the foregoing document was served on the parties of record, via the method indicated:

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[]	Facsimile
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